

United States District Court
Eastern District of Michigan
Southern Division

United States of America,

Plaintiff,

Criminal Case No: 2:18-cr-20800

Hon. Stephen J. Murphy

v.

D-1 Dr. Rajendra Bothra

D-2 Dr. Eric Backos

D-3 Dr. Ganiu Edu

D-4 Dr. David Lewis

D-5 Dr. Christopher Russo

D-6 Dr. Ronald Kufner,

Defendants.

Forfeiture Bill of Particulars

The United States of America, by and through its counsel, Matthew Schneider, United States Attorney and Shankar Ramamurthy, Assistant United States Attorney, submits this Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure. The United States submits this Forfeiture Bill of Particulars to supplement the criminal forfeiture allegations included in the Indictment to list specific property that the United States intends to forfeit upon Defendants' conviction. (Dkt. #1.)

This Forfeiture Bill of Particulars is also filed to comply with the provisions of Title 18, United States Code, Section 983(a)(3), and the Government reserves its right to file a civil forfeiture complaint regarding the identified property, if necessary, at the conclusion of this criminal action.

The Forfeiture Bill of Particulars incorporates by reference, in its entirety, the Indictment, specifically the Forfeiture Allegation. Property subject to forfeiture, pursuant to 21 U.S.C. § 853, 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461, and 18 U.S.C. § 982(a)(7), includes, but is not limited to:

- a) \$129,123.96 Funds in Comerica Bank Account No. 0013166764 in the names of Rajendra and Pramila Bothra;
- b) \$1,100,460.30 Funds in Comerica Bank Account No. 1852393634 in the name of The Pain Center USA, PLLC;
- c) \$102,686.96 Funds in Comerica Bank Account No. 6822878135 in the names of Rajendra and Pramila Bothra;
- d) \$19,607.44 Funds in Comerica Bank Account No. 6825289306 in the names of Ronald and Mary Kufner;
- e) \$74,333.55 Funds in Comerica Bank Account No. 6826050475 in the name of David Lewis Jr.;
- f) \$30,959.44 Funds in Comerica Bank Account No. 6825289462 in the names of Ronald and Mary Kufner;

- g) \$4,501,200.15 Funds in Comerica Bank Account No. 9416234848 in the name of Interventional Pain Center, PLLC;
- h) \$337,080.87 Funds in Comerica Bank Account No. 1852973666 in the name of Kaiser Real Estate, LLC;
- i) Funds in Bank of America Account No. 2269017298 in the name of Eric and Alcesa Backos (approximately \$2,852.33);
- j) Funds in Fidelity Investments Account No. 169-421650 in the name of Eric and Alcesa Backos (approximately \$384,006.23);
- k) Funds in Fidelity Investment Account No. 637-409820 held in the name of Rajendra Bothra (approximately \$12,195,220.59);
- l) Funds in Fidelity Investment Account No. 627-006648 in the name of Rajendra Bothra (approximately \$4,633,351.67);
- m) Funds in Fidelity Investment Account No. 645-125105 in the name of Rajendra Bothra (approximately \$20.40);
- n) Funds in Fidelity Investment Account No. 675-597678 in the name of Sonia Bothra (approximately \$97,417.25);
- o) Funds in Fidelity Investment Account No. 637-299600 in the name of The Pain Center USA, PLLC (approximately \$553,663.69);
- p) \$1,095,860.05 Funds in Comerica Bank Account No. 1851508240 in the name of The Pain Center USA, PLLC;

- q) \$579,307.63 Funds in Comerica Bank Account No. 1853038691 in the name of Interventional Pain Center, PLLC;
- r) Funds in Bank of America Account No. 5404770967 in the name of Christopher Russo (approximately \$13,690.26);
- s) Funds in Bank of America Account No. 195039782 in the name of Eric and Alcesa Backos (approximately \$16,967.97).

The Forfeiture Bill of Particulars does not limit the United States from seeking the forfeiture of additional property, including substitute assets, or the imposition of a forfeiture money judgment.

Respectfully submitted,

Matthew Schneider
United States Attorney

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Dated: February 1, 2019

Certificate of Service

I hereby certify that on February 1, 2019, the foregoing document was electronically filed with the Clerk of the Court using the ECF system which will send notification to all ECF participants.

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